

Exhibit G

From: Turner, Michael
Sent: Tuesday, January 7, 2025 10:19 AM
To: Matthew Dowd; Elliot Gee
Cc: Chen, Robert; Van Tine, Kristen; Patterson, Lauren; Kendall, Sandra
Subject: RE: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Matt,

We have not received Atticus' promised collection and production plan, or a response to my inquiry about its status. Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), Plaintiffs hereby give notice that we will soon file a motion to compel Atticus to abide by its agreement to send an appropriate collection and production plan for response to Plaintiffs' subpoena, and to produce all responsive data called for by Plaintiffs' subpoena. The motion will be filed in the United States District Court for the Middle District of North Carolina.

Sincerely,

Mike Turner
Federal Trade Commission
202.326.3649

From: Turner, Michael
Sent: Monday, December 23, 2024 4:04 PM
To: 'Matthew Dowd' <mdowd@dowdscheffel.com>; 'Elliot Gee' <egee@dowdscheffel.com>
Cc: Chen, Robert <rchen@ftc.gov>; Van Tine, Kristen <kvantine@ftc.gov>; Patterson, Lauren <lpatterson@ftc.gov>; Kendall, Sandra <skendall@ftc.gov>
Subject: RE: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Matt,

We have not received the description of Atticus' plan to collect and produce documents in response to Plaintiffs' subpoena that Atticus agreed to provide by December 20. When can we expect Atticus to fulfill its commitment?

Sincerely,

Mike Turner
Federal Trade Commission
202.326.3649

From: Turner, Michael
Sent: Monday, November 25, 2024 4:36 PM
To: Matthew Dowd <mdowd@dowdscheffel.com>; Elliot Gee <egee@dowdscheffel.com>
Cc: Chen, Robert <rchen@ftc.gov>; Van Tine, Kristen <kvantine@ftc.gov>; Patterson, Lauren <lpatterson@ftc.gov>; Kendall, Sandra <skendall@ftc.gov>
Subject: RE: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Matt,

I interpret your email to mean that you agree to my summary on behalf of Atticus, subject to reasonable objections including privilege and work-product objections, and on that basis we will hold off on filing our planned motion to compel.

We will send to you the production Atticus made to the FTC during the investigation; it may take us a day or so to put it together. We will be in touch when it is ready for transmittal.

Best,

Mike Turner
Federal Trade Commission
202.326.3649

From: Matthew Dowd <mdowd@dowdscheffel.com>

Sent: Monday, November 25, 2024 3:52 PM

To: Turner, Michael <mturner@ftc.gov>; Elliot Gee <egee@dowdscheffel.com>

Cc: Chen, Robert <rchen@ftc.gov>; Van Tine, Kristen <kvantine@ftc.gov>; Patterson, Lauren <lpatterson@ftc.gov>; Kendall, Sandra <skendall@ftc.gov>

Subject: Re: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Mike,

Thank you for the email and the summary. As discussed, Atticus is now responding to five separate subpoenas. Atticus is working in good faith to provide responses based on reasonable searches and collections of information.

1) Atticus will produce data responsive to Request Nos. 3 and 6 by January 22, 2025, subject to Atticus's reasonable objections. With respect to Request No. 3, as the parties likely know, much of the information sought by Request No. 3 is available on Atticus's website at the following links:

- <https://atticusllc.com/agricultural-products/>
- <https://atticusllc.com/ecocore-products/>

Nonetheless, Atticus will continue to collect and review potentially responsive information and documents.

2) Atticus agrees to provide a reasonable description of its plan to collect and review responsive documents, as suggested below, subject to any objections including privilege and work-product objections.

3) To that end, and to assist in efficiency and in minimizing burdens on Atticus, would you kindly make available the document set that Atticus previously produced in response to the FTC's CID (ATTICUSFTC000001-ATTICUSFTC020328)? Due to a technical issue on our end, it is much appreciated that the FTC can re-share those files with us. See the attached email.

4) As stated on the call, Atticus is working to ensure that its response to each of the five outstanding subpoenas is reasonable and as complete as required. Given that the fifth subpoena was not served on Atticus until November 15, 2024, Atticus is again having to re-assess the issues attendant with responding to the multiple subpoenas.

Best,
Matt

Matthew J. Dowd
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<http://www.linkedin.com/in/matthewdowd>

From: "Turner, Michael" <mturner@ftc.gov>
Date: Monday, November 25, 2024 at 3:07 PM
To: Matthew Dowd <mdowd@dowdscheffel.com>, Elliot Gee <egee@dowdscheffel.com>
Cc: "Chen, Robert" <rchen@ftc.gov>, "Van Tine, Kristen" <kvantine@ftc.gov>, "Patterson, Lauren" <lpatterson@ftc.gov>, "Kendall, Sandra" <skendall@ftc.gov>
Subject: RE: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Matt,

Thank you for the productive call a few minutes ago. Rather than expend time and resources in a motion to compel dispute, we agreed that Atticus will produce data responsive to Requests 3 and 6 of Plaintiffs' subpoena by **January 22, 2025**.

We also agreed that Atticus would send Plaintiffs its plan for collection and review of responsive documents by **December 20, 2024**. Plaintiffs further request that Atticus send this information as soon as it is available, if prior to that date. In order for Plaintiffs to evaluate the sufficiency of Atticus' subpoena response, this plan should include the following information:

- The names and positions of Atticus documents custodians
- The locations of centrally held documents collected
- Search terms applied
- Procedure for reviewing search-term-hits for responsiveness
- Procedure for reviewing centrally held documents if not included in search term review
- Any requests that Atticus does not intend to respond to, whether in whole or in part
- Number of documents collected and the number of responsive, non-privileged documents
- Atticus' plan for logging privilege claims, if it differs from process set out in subpoena and ESI Order entered in this action

During the call, you informed me that Atticus was now actively negotiating with Syngenta and Corteva the scope of its responses to their subpoenas (and soon with other Relevant Parties), and that Atticus only intends to collect and produce once in response to the five subpoenas it has received. The scope of Atticus' agreements with other Relevant Parties will necessarily affect its intended response to Plaintiffs. Accordingly, Plaintiffs now also request that Atticus inform Plaintiffs of the details of any Atticus proposal

to a Relevant Party on any of the above enumerated information, as well as the details of any final agreement on said information with a Relevant Party, within a business day of proposal or agreement.

Do you agree to the above on behalf of Atticus? Please let me know by 3:45pm Eastern.

Sincerely,

Mike Turner
Federal Trade Commission
202.326.3649

From: Matthew Dowd <mdowd@dowdscheffel.com>
Sent: Monday, November 25, 2024 11:00 AM
To: Turner, Michael <mturner@ftc.gov>; Elliot Gee <egee@dowdscheffel.com>
Cc: Chen, Robert <rchen@ftc.gov>; Van Tine, Kristen <kvantine@ftc.gov>; Patterson, Lauren <lpatterson@ftc.gov>; Kendall, Sandra <skendall@ftc.gov>
Subject: Re: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Mike,

2 PM will work.

Thanks,
Matt

From: "Turner, Michael" <mturner@ftc.gov>
Date: Monday, November 25, 2024 at 10:34 AM
To: Matthew Dowd <mdowd@dowdscheffel.com>, Elliot Gee <egee@dowdscheffel.com>
Cc: "Chen, Robert" <rchen@ftc.gov>, "Van Tine, Kristen" <kvantine@ftc.gov>, "Patterson, Lauren" <lpatterson@ftc.gov>, "Kendall, Sandra" <skendall@ftc.gov>
Subject: RE: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Matt,

Are you available at 11:30am Eastern? Otherwise, please suggest a time prior to 2:30pm.

Thanks,

Mike Turner
Federal Trade Commission
202.326.3649

From: Matthew Dowd <mdowd@dowdscheffel.com>
Sent: Monday, November 25, 2024 10:11 AM
To: Turner, Michael <mturner@ftc.gov>; Elliot Gee <egee@dowdscheffel.com>
Cc: Chen, Robert <rchen@ftc.gov>; Van Tine, Kristen <kvantine@ftc.gov>; Patterson, Lauren <lpatterson@ftc.gov>; Kendall, Sandra <skendall@ftc.gov>
Subject: Re: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Mike,

Thank you for the email. I am happy to discuss the motion. Please let me know when you can be available.

Best,
Matt

From: "Turner, Michael" <mturner@ftc.gov>
Date: Friday, November 22, 2024 at 4:18 PM
To: Matthew Dowd <mdowd@dowdscheffel.com>, Elliot Gee <egee@dowdscheffel.com>
Cc: "Chen, Robert" <rchen@ftc.gov>, "Van Tine, Kristen" <kvantine@ftc.gov>, "Patterson, Lauren" <lpatterson@ftc.gov>, "Kendall, Sandra" <skendall@ftc.gov>
Subject: Atticus subpoena, FTC et al. v. Syngenta et al., No. 22-cv-828 (M.D.N.C.)

Matt,

Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), Plaintiffs hereby give notice that we will file a motion to compel Atticus' compliance with the subpoena issued on April 29, 2024, in the above captioned matter, in the U.S. Middle District of North Carolina. This motion will request an order for Atticus to produce data in response to certain subpoena requests and to propose a methodology for collection and production of responsive documents.

Please let me know if you would will accept service of the motion by email, or if you would like to discuss the motion.

Sincerely,
Mike Turner

Michael J. Turner | Attorney
Anticompetitive Practices I Division
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Federal Trade Commission
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